## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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IN RE	)	Civil Docket for Case No.
VASO ACTIVE PHARMACEUTICALS,	)	1:04-CV-10708-RCL
SECURITIES LITIGATION	)	
	)	Judge Reginald C. Lindsey
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## MOTION OF PLAINTIFFS KOUROSH ALIPOUR ET AL FOR ADMISSION PRO HAC VICE – ASSENTED TO

Pursuant to Rule 83.5.3 (b) of the Local Rules of the United States District Court for the District of Massachusetts, the undersigned, a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, hereby moves to grant permission for William B. Federman, Esq. of the law firm of Federman & Sherwood, 120 N. Robinson Avenue, Suite 2720, Oklahoma City, Oklahoma 73102, to appear *pro hac vice* on behalf of the plaintiffs Kourosh Alipour, timmy Smith and Douglas Weymouth (the "Alipour Group") in this matter, and to permit him to participate in all matters, including any oral proceedings and trial in this action, which arise during the representation of plaintiff. As grounds for its motion, the Alipour Group state that:

- 1. The Alipour Group filed its securities action seeking remedies against the defendants under the Securities Exchange Act of 1934.
- 2. Attorney Federman is highly experienced in securities actions such as this case and therefore will provide significant assistance in the prosecution of this action.
- 3. Attorney Federman is a member in good standing of the bar of the State of Oklahoma and in every court in which he is admitted (see Affidavit of William B. Federman,

Esq., attached hereto as Exhibit A).

- The State of Oklahoma grants like privileges to members of the bar, in good 4. standing, of the Commonwealth of Massachusetts.
  - 5. A proposed Order is attached as Exhibit B.

WHEREFORE, the plaintiff Alipour Group requests that this Court admit William B.

Federman Esq. pro hac vice, pursuant to Local Rule 83.5.3(b).

Respectfully Submitted,

Kourish Alipour, Timmy Smith And Douglas Weymouth, Plaintiffs,

By their attorney,

Dated: July 2, 2004

/s/ Alan L. Kovacs

Alan L. Kovacs (BBO #278240) Law Office of Alan L. Kovacs 2001 Beacon Street, Suite 106 Boston, Massachusetts 02135 (617)964-1177

## ASSENTED TO:

On behalf of Defendants Vaso Active Pharmaceueticals, Inc. et al.

/s/ Colleen Dunham Henschke\_

Colleen Dunham Henschke, Esq. (BBO#645009) Wilmer Cutler Pickering Hand and Dorr LLP 60 State St. Boston, MA 02109 (617) 526-6000

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 2nd day of July, 2004, a true copy of the foregoing Motion of Plaintiffs Kourosh Alipour et al for Admission Pro Hac Vice, was served by email.

Alan L. Kovacs